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*Attorneys for Non-Party
 Aveanna Healthcare, LLC*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

United States of America,)	CASE NO. 2:23-cr-00055-CDS-DJA
)	
Plaintiff,)	JOINT STIPULATION BETWEEN
)	NON-PARTY AVEANNA
v.)	HEALTHCARE, LLC AND
)	DEFENDANT EDUARDO RUBEN
Eduardo Ruben Lopez,)	LOPEZ TO EXTEND RETURN DATE
)	ON RULE 17 SUBPOENA
Defendant.)	
)	<u>[FILED UNDER SEAL UNDER</u>
)	<u>COURT ORDER (ECF NO. 65)]</u>
)	
)	(FIRST REQUEST)

Non-party Aveanna Healthcare, LLC (“Aveanna”) and Defendant Eduardo Ruben Lopez (“Defendant”), by and through their counsel, agree and jointly stipulate as follows:

WHEREAS, on December 27, 2023 counsel for Aveanna confirmed that it could accept service on behalf of Aveanna, and Defendant served Aveanna with a subpoena *duces tecum* issued pursuant to Federal Rule of Criminal Procedure 17 (the “Subpoena”);

WHEREAS, the Subpoena has a return date of December 29, 2023;

WHEREAS, on December 27, 2023, and in light of the intervening holidays, the return deadline, and to provide Aveanna with sufficient time to respond to or otherwise move to quash the subpoena, Aveanna and Defendant agreed in writing that Aveanna shall have until January 31, 2024 to respond to the Subpoena;

WHEREAS, Aveanna wishes to notify the Court of the extension of the return date on the Subpoena to January 31, 2024;

1 **WHEREAS**, the office of Defendant's counsel has changed since the subpoena was
2 submitted, the materials in response shall be delivered to the new address or electronically to his
3 firm.

4 **THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, that Aveanna shall
5 have until January 31, 2024, to respond to or otherwise move to quash the subpoena.

6 Dated: January 8, 2024

Dated: January 8, 2024

7 SNELL & WILMER L.L.P.

PILLSBURY WINTHROP SHAW
PITTMAN LLP

9
10 By: /s/ Bradley Austin

By: /s/ Mark L. Krotoski

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*Attorneys for Defendant Eduardo Ruben
Lopez*

18 **IT IS SO ORDERED:**

19
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21 

22 DANIEL J. ALBREGTS
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 1/10/2024

CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2024, I electronically filed the foregoing document using the CM/ECF System for filing and served this document to counsel for Aveanna Healthcare, LLC via U.S. Mail and email. *See also*, the Declaration of Tammy A. Tsoumas, Esq., attached as Exhibit 1 to January 8, 2023 Joint Motion to Seal.

/s/ Ana Cervantes

An employee of PILLSBURY WINTHROP SHAW
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Snell & Wilmer

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